

**IN THE FEDERAL DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DR. ERNEST CAMPONOVO	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
V.	:	
	:	
DR. MUNIR UWAYDAH and	:	
PROMETHEUS HEALTH IMAGING, INC.	:	
	:	
Defendants	:	NO. 02-cv-3661

ORDER

AND NOW, this day of , 2003, it is hereby ORDERED and DECREED that Defendant, Prometheus Health Imaging, Inc., shall provide answers to Plaintiff's Interrogatories in Aid of Execution and Request for Production of Documents in Aid of Execution without objection within ten (10) days of the date of this Order or risk sanctions as the Court deems appropriate.

BY THE COURT:

J.

IN THE FEDERAL DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DR. ERNEST CAMPONOVO	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
V.	:	
	:	
DR. MUNIR UWAYDAH and	:	
PROMETHEUS HEALTH IMAGING, INC.	:	
	:	
Defendants	:	NO. 02-cv-3661

MOTION TO COMPEL DISCOVERY

Plaintiff, Dr. Ernest Camponovo, by and through his attorneys, hereby files this Motion to Compel Answers to Plaintiff's Interrogatories in Aid of Execution and Request for Production of Documents in Aid of Execution and in support thereof states as follows:

1. Plaintiff initiated the within action by way of a Complaint filed June 7, 2002.
2. On May 23, 2002, Defendant Prometheus Health Imaging, Inc. answered Plaintiff's Complaint and raised its New Matter.
3. On August 22, 2003, Plaintiff secured a judgment against Defendants in the amount of One Million Seven Hundred Sixty-seven Thousand Dollars (\$1,767.00) .
4. On August 18, 2004, Plaintiff's counsel forwarded Interrogatories in Aid of Execution and Request for Production of Documents in Aid of Execution to Defendant's counsel. See Exhibit "A" attached hereto.
5. At this time, Plaintiff's Interrogatories in Aid of Execution and Request for Production of Documents in Aid of Execution remain outstanding. No Answer or

objection has been filed.

6. Plaintiff will suffer great prejudice if Defendant does not produce answers to Plaintiff's written discovery.
7. Plaintiff respectfully requests an Order of this Court compelling Defendant to produce answers to Plaintiff's Interrogatories in Aid of Execution and Request for Production of Documents in Aid of Execution.

WHEREFORE, Plaintiff Dr. Ernest Camponovo respectfully requests that the Court enter an Order compelling Defendant to produce answers to Plaintiff's Interrogatories in Aid of Execution and Request for Production of Documents in Aid of Execution or suffer appropriate sanctions to be imposed upon further application of the Court.

MICHAEL D. SHAFFER, ESQUIRE
Attorney for Plaintiff
Dr. Ernest Camponovo

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the within Motion to Compel was made on October 7, 2004 to counsel of record via U.S. First Class Mail, postage prepaid.

MICHAEL D. SHAFFER, ESQUIRE

Date: _____